



Release Reporting Advisory Committee Integration/Simplicity Workgroup November 26, 2007 Meeting

Integration/Simplicity Workgroup Notes

The meeting was conducted through a conference call that took place at 1:30 pm.

Members: Todd Berman, David Williams, Matthew Williamson, Matt Twerdy, Robert Silvestri, Lori Saliby

Agenda Item 1 - Work Group Goals & Objectives

The group discussed ideas that the workgroup should focus its efforts. One idea was to create a system whereby all technical personal in a plant will have the ability to figure out whether there is a need to report within a 10 minute timeframe. After some discussion, the workgroup decided to table the discussion for later.

It was mentioned that the workgroup should not overlap other workgroup efforts. However, there will be some overlap in current regulations such as remediation and underground storage tanks.

Agenda Item 2 - Strategy for Reviewing Definitions

It was stated by Lori Saliby that the Commissioner indicated that Workgroups need to build upon the 1994 draft reporting of releases regulations and the 1998 Recommended Strategy for Release Reporting.

The Workgroup began discussing definitions that were identified in the draft 1994 regulations. The following were discussed:

Impermeable surface/containment

- too long and complex
- Impermeable definition can be found in the Remediation Standards Regulations that reference caps.
- Lori mentions that there are two different purposes – one purpose is containment and the other contaminated soil.

The workgroup agreed the definition of impermeable would be placed on the agenda for further discussion in the future.

- One member mentioned to retain concept.
- Maybe secondary containment instead of impermeable surface.

Inert

The workgroup did not feel this concept very valuable.

Release

Several concerns raised with this definition were legal process that are not spills such as:

- pumping
- pouring
- transferring

Reportable material

This is a key concept that the group will need to explore going forward.

Watershed land

Confusing and complex to use in an emergency spill situation.

- pretty complex to consider land use

Reporting quantity

Definition falls under the Risk Assessment Workgroup goals and objectives.

Extremely Hazardous Substance (EHS)

Responsible Party

Two points were expressed

1. Should definition of responsible party be defined – who needs to report
2. Redoing release reporting forms now

Need regulations to flow from form.

All definitions

-It was stated that the 1998 Recommended Strategy for Release Reporting recommends that the definitions and concepts be clear and consistent with general statutes.

-The workgroup will have more work as they hear from the other workgroups, particularly the Models workgroup.

Agenda Item 3 - Reporting Information

-Significant Hazardous Notification guidelines may be helpful as to who reports to who

-Note injuries

-More information for certain types of chemicals – risk assessment

Agenda Item 4 - Implementation Issues

Agenda Item 5 - Meeting Schedule

The workgroup agreed that the next meeting should be face to face with all members. Flexibility in scheduling should be considered and agenda should be tailored towards smaller issues. It is far better to meet more frequency then once a month.

It was mentioned that the Release Reporting Advisory Committee is scheduled to meet on December 11. Each Monday after the Advisory Committee meeting, the workgroup would like to meet at 1:30 pm.

Other issue to discuss include:

-release vs release to environment

The next workgroup discussions will be based on the December 11 Advisory Committee discussions.